

<b>SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT</b>  <b>ENGINEERING AND COMPLIANCE DIVISION</b>  <b>APPLICATION PROCESSING AND CALCULATIONS</b>	PAGE 1	PAGES 4
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	PROCESSOR MFN	REVIEWER

**ADMINISTRATIVE CHANGE OF CONDITION  
PERMIT TO OPERATE ANALYSIS**

**FACILITY MAILING ADDRESS**

Light Metals, Inc.  
13329 Ector Street  
City of Industry, CA 91746

(ID: 083102      NOx RECLAIM Cycle 2      -      Title V)

**EQUIPMENT LOCATION**

Same as above

**EQUIPMENT DESCRIPTION**

**APPLICATION NO.:                      510384                      CHANGE OF CONDITION**  
**PROCESS 4:                      AIR POLLUTION CONTROL**

C15: BAGHOUSE, NO. 1, HARSELL ENGINEERING, 9,150 SQ. FT. TOTAL FILTER AREA, THREE ¾ HP DRIVE SECTIONS, WITH LIMSTONE INJECTION AND A BAG LEAK DETECTION SYSTEM, VENTING REVERBERATORY FURNACE #A (D11) AND AFTERBURNER #2 (C25).

**APPLICATION NO.:                      510385                      CHANGE OF CONDITION**  
**PROCESS 4:                      AIR POLLUTION CONTROL**

C16: BAGHOUSE, NO. 2, HARSELL ENGINEERING, 12,200 SQ. FT. TOTAL FILTER AREA, FOUR SECTIONS, WITH LIMSTONE INJECTION AND A BAG LEAK DETECTION SYSTEM VENTING REVERBERATORY FURNACE #A (D11) AND AFTERBURNER #2 (C25).

**APPLICATION NO.:                      510387                      CHANGE OF CONDITION**  
**PROCESS 4:                      AIR POLLUTION CONTROL**

AIR POLLUTION CONTROL SYSTEM (C23) CONSISTING OF:

1. BAGHOUSE, NO. 3, WHEELABRATOR, MODEL 171, THREE SECTIONS, WITH 1056 BAGS, 0'-5" DIA. X 14'-3" L. EACH, 20,274 SQ. FT. TOTAL FILTER CLOTH AREA WITH A BAG LEAK DETECTION SYSTEM.
2. LIME INJECTION STATION, WITH A 6 CU. FT. HOPPER AND A ½ HP FEEDER.

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3. EXHAUST SYSTEM WITH A 100 HP BLOWER VENTING ONE ROTARY DRYER (D6) AND ONE AFTERBURNER (C9).

**APPLICATION NO.: 510389 CHANGE OF CONDITION**  
**PROCESS 4: AIR POLLUTION CONTROL**

AIR POLLUTION CONTROL SYSTEM (C39) CONSISTING OF:

1. BAGHOUSE, NO. 4, ICA REES, MODEL 4-2400, MECHANICAL SHAKER TYPE, 640 BAGS, 10,053 SQ. FT. TOTAL CLEANING AREA WITH A BAG LEAK DETECTION SYSTEM.
2. EXHAUST SYSTEM WITH A 60 HP BLOWER VENTING AN ALUMINUM DROSS BUILDING (D52).

**APPLICATION NO.: 510391 CHANGE OF CONDITION**  
**PROCESS 4: AIR POLLUTION CONTROL**

C50: BAGHOUSE, NO. 6, PANGBORN, MODEL 5-456 CT, MECHANICAL SHAKER TYPE, 2,280 BAGS, EACH, 0'-5" DIA X 11'-0" L, 33,630 SQ. FT, TOTAL CLEANING AREA WITH A BAG LEAK DETECTION SYSTEM VENTING ONE ALUMINUM HOLDING FURNACE (D42) AND THE COMBUSTION GASES AND CHARGE WELLS OF TWO ALUMINUM REVERBERATORY FURNACES (D11 & D21).

**APPLICATION NO.: 510392 FACILITY PERMIT MODIFICATION**

### **HISTORY**

Applications Nos. 510384, 510385, 510387, 510389 and 510391 were filed on April 30, 2010, for administrative change of condition permits; as required by recently adopted Rule 1155, to establish requirements for permitted particulate matter air pollution control devices. Application No. 510392, for a RECLAIM/Title V Facility Permit Modification was filed on April 30, 2010.

The following compliance activity was found in District records (CLASS computer database) for the past 2 years.

### **Complaints:**

There have been 16 complaints in the last 2 years credited to Light Metals. Twelve of the complaints have come from a local resident, who lives about one block northeast of Light Metals' property line. Three of the complaints are from another local resident who lives about 300 meters northeast of Light Metal's property line. One complaint was submitted anonymously. All 16 complaints are for odors.

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In thirteen of the investigations, the inspector was unable to detect any odor emanating from Light Metals. In the other 3 investigations, the inspector detected an odor from Light Metals, a 2.5, 3.0 and 4.0 on a scale of 1 to 5. When the inspector was standing next to the line where the ingots cool the odor is a 5.

#### **Notices to Comply:**

D03250, 02/26/10 to use compliant coating and to keep usage records

Follow-up inspection on 03/12/10 indicated applicant in compliance.

D23503, 05/27/09 to always submit Semi-Annual Monitoring Report for time period July 1-Dec 31 by February 28<sup>th</sup>.

#### **Notices of Violation:**

There have been no Notices of Violation issued to Light Metals within the past 2 years.

### **PROCESS DESCRIPTION**

Light Metals, Inc. is an aluminum scrap and chip remelting facility. They are located in an area that is a mixture of both industrial and residential. Their entire northeast property line borders Torch Middle School.

### **EMISSIONS**

The requested administrative permit change of condition does not impact the emission calculations for the facility or equipment. All previous emissions shall be brought forward.

### **RULES COMPLIANCE**

RULE 212: Public Notice is not required. This facility is adjacent to Torch Middle School; however, Rule 212 (c)(1) is not triggered as there is no emission increase associated with the above requested administrative change of condition.

RULE 401: Visible emissions are not expected with proper operation of this equipment.

RULE 402: Nuisance is not expected if equipment is properly operated and maintained.

RULE 403: Fugitive dust is not expected if equipment is properly operated and maintained.

RULE 404: Compliance is expected if equipment is properly operated and maintained.

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RULE 1155: District Rule 1155 was adopted December 4, 2009, to establish requirements for permitted particulate matter (PM) air pollution control devices. Light Metals has 5 baghouses that are affected by this newly adopted rule. One of the requirements is that the operator or a Tier 3 baghouse install a Bag Leak Detection System (BLDS) and to file a permit application for the BLDS no later than May 1, 2010. Light Metals filed their permits on April 30, 2010. Four of the baghouses already have a BLDS, the fifth baghouse will have a BLDS installed prior to rule deadline.

REG XIII/XX: BACT is not triggered, there are no emission increases.

REG XXX: This is a minor permit revision. EPA 45-day review is required.

Subpart RRR: Light Metals is a Secondary Aluminum Production company and subject to 40 CFR 63 Subpart RRR, the above requested changes do not have an adverse effect on the compliance status of the Facility.

### **RECOMMENDATION**

Issue Permit to Operate as described in the facility permit and this report.